



Oregon

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August 27, 2014

Also Sent Via E-mail

Mr. Robert J. Wyatt
NW Natural
220 N.W. Second Avenue
Portland, OR 97209

**Re: Response to Comments on the Fill Water-Bearing Zone Trench Investigation Sampling and Analysis Plan and Quality Assurance Project Plan - Shoreline Segments 1 and 2, NW Natural Property and the Northern Portion of the Siltronic Corporation Property
Portland, Oregon
ECSI Nos. 84 and 183**

Dear Mr. Wyatt:

DEQ reviewed the August 8, 2014 letter that responds to our July 15, 2014 comments on the "Sampling and Analysis Plan and Quality Assurance Project Plan, Fill WBZ Trench – NW Natural Gasco Site" dated June 10, 2014 (Trench SAP/QAPP). NW Natural submitted the Trench SAP/QAPP as a supporting document to the Revised Trench Work Plan¹ that DEQ approved on April 28, 2014 with comments. Anchor QEA, LLC prepared the Revised Trench Work Plan and the Trench SAP/QAPP on behalf of NW Natural.

The purpose of this letter is to inform NW Natural that the August 8th letter substantially addresses DEQ's July 15th comments. Besides DEQ, the U.S. Environmental Protection Agency (EPA) reviewed NW Natural's response. EPA concurs with DEQ's determination.

DEQ accepts NW Natural's August 8th responses and approves the Trench SAP/QAPP subject to revising the document as indicated below.

Response to DEQ's General Comment

The first paragraph of the response should be revised as indicated below.

- The following sentence should be added as the third sentence:

"Small holes will be drilled in the bottom of the end caps of MW-39F, MW-40F, MW-41F, and MW-42F to allow groundwater to drain out of the monitoring wells if groundwater levels decline below the bottom of the installations."

¹ Anchor QEA, Inc., 2013, "Fill WBZ Trench Investigation Work Plan Gasco/Siltronic," November (received November 18, 2013), a work plan prepared on behalf of NW Natural.

- The sentence below should be added to the end of the paragraph.

“In the event fine-grained fill material is present on top of the native silt and shifting the screen upwards results in inadequate groundwater being present in the monitoring well to achieve data collection objectives, the location of the installation should be moved.”

Response to DEQ’s Comment on Section 1.2

DEQ accepts NW Natural’s approach to collecting and analyzing groundwater samples from MW-39F, MW-40F, MW-41F, and MW42F with one clarification. Subsequent to the August 8th response being submitted NW Natural has agreed to add total petroleum hydrocarbons (TPH) and TPH fractions to the groundwater monitoring program. Consequently, TPH and TPH fractions should be added to the “integrated monitoring program” analyte list.

Response to DEQ’s Comment on Attachment 1, Section 4.2

DEQ understands that depending on the location of the monitoring well, liquid investigation-derived waste (IDW) will be managed through treatment at either the Gasco pre-treatment facility or the Siltronic pre-treatment facility (i.e., the TCE Contaminated Material Management Area [CMMA] pre-treatment facility). Based on this information, Section 4.2 should be revised by deleting the second sentence and inserting the text below:

“Liquid IDW generated during development and sampling of monitoring wells MW-39F, MW-40F, and MW-41F will be initially treated at the Gasco pre-treatment facility. Liquid IDW from monitoring well MW-42F will be treated first at the TCE CMMA pre-treatment facility. Liquid IDW treated at the pre-treatment facilities will then be routed to the Gasco Site wastewater treatment plant for final treatment prior to discharge to the Willamette River.”

Next Steps

DEQ requests that NW Natural submit a final Trench SAP/QAPP revised as indicated above on or before September 12th. DEQ continues to consider it important to expeditiously complete the approved scope of work so trench design can proceed as soon as practicable. DEQ requests that NW Natural schedule field work to begin as soon as practicable. Subsequent to completion of the field work, NW Natural will submit the Fill WBZ Trench Design Evaluation Report within 90-days of receipt of the geotechnical testing results. DEQ understands this timeframe will provide NW Natural, Siltronic Corporation, and any subconsultants with sufficient time to fully review the document.

Mr. Robert Wyatt
NW Natural
August 27, 2014
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Please feel free to contact me with questions regarding this letter.

Sincerely,

Dana Bayuk
Project Manager
Cleanup and Site Assessment Section

Cc: Patty Dost, Pearl Legal Group
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